

REMARKS

By this amendment, claims 1, 6, 10, 16, 20, and 21 have been amended. Accordingly, claims 1-21 are currently pending in the application, of which claims 1, 10, 20, and 21 are independent claims. Applicants appreciate the indication that claims 9 and 19 contain allowable subject matter.

Applicants respectfully submit that the above amendments do not add new matter to the application and are fully supported by the specification. Support for the amendments may be found at least in Figures 2-3, and at paragraphs [0037] and [0044] of the specification.

In view of the above amendments and the following Remarks, Applicants respectfully request reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

Rejections Under 35 U.S.C. § 102

Claims 1-3, 6, 7, 10-13, 16, 17, 20, and 21 stand rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by U.S. Patent No. 6,870,186 issued to Park, *et al.* ("Park").

In order for a rejection under 35 U.S.C. § 102(e) to be proper, a single reference must disclose every claimed feature. To be patentable, a claim need only recite a single novel feature that is not disclosed in the cited reference. Thus, the failure of a cited reference to disclose one or more claimed features renders the 35 U.S.C. § 102(e) rejection improper.

Applicants respectfully submit that Park fails to disclose every limitation of claim 1. Claim 1 as amended recites, *inter alia*, "a second pixel electrode ... contacting at least an upper surface and a side surface of the first pixel electrode." Park fails to disclose at least these features. Specifically, the examiner asserts that Park discloses first pixel electrode 440 and second pixel electrode 438. See Office Action, page 2. However, as shown in Park's Fig. 11, electrode 438 contacts only the top surface of electrode 440. Similarly, as shown in Park's Fig.

12. electrode 538 contacts only the top surface of electrode 514b. Park fails to disclose "a second pixel electrode ... contacting at least an upper surface and a side surface of the first pixel electrode." Thus, Park fails to disclose every feature of claim 1.

Similarly, Park fails to disclose every feature of claims 10, 20, and 21. Claim 10 as amended recites, *inter alia*, "forming a second pixel electrode ... to contact at least an upper surface and a side surface of the first pixel electrode." Claim 20 as amended recites, *inter alia*, "a second pixel electrode ... contacting at least an upper surface and the side surface of the first pixel electrode." Claim 21 as amended recites, *inter alia*, "forming a second pixel electrode ... to contact at least an upper surface and the side surface of the first pixel electrode." For at least the reasons asserted above with respect to claim 1, Park fails to disclose at least these features of claims 10, 20, and 21.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(e) rejection of claims 1, 10, 20, and 21. Claims 2-9 depend from claim 1, and claims 11-19 depend from claim 10. These claims are allowable at least for this reason. Since none of the other prior art of record discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claims 1, 10, 20, and 21, and all the claims that depend therefrom, are allowable.

Rejections Under 35 U.S.C. § 103

Claims 4, 5, 8, 14, 15, and 18 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Park. Applicants respectfully submit that claim 1 and 10 are allowable over Park for at least the reasons submitted above. Further, the examiner's purported modifications of Park fail to cure the deficiencies of Park alone, noted above with regard to claims 1 and 10. Hence, claims 4, 5, 8, 14, 15, and 18 are allowable at least because they depend from allowable base claims.

Claim Objection

In the Office Action, claims 9 and 19 were objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claims and any intervening claims.

Claims 9 and 19 have not been amended because Applicants respectfully submit that claims 9 and 19 depend from allowable base claims, and are allowable at least for this reason. Accordingly, Applicants respectfully request withdrawal of the objection for claims 9 and 19.

CONCLUSION

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

/hae-chan park/

Hae-Chan Park
Reg. No. 50,114

Date: December 13, 2006

CUSTOMER NUMBER: 58027
H.C. Park & Associates, PLC
8500 Leesburg Pike
Suite 7500
Vienna, VA 22182
Tel: 703-288-5105
Fax: 703-288-5139
HCP/WMH/kbs